C-A Unreviewed Safety Issue (USI) Form

Title of USI: NSRL Animal Storage Time Limit Change

Description of USI (use attachments if necessary):

The 24 hour animal storage limit, 12 hours for certain USDA regulated species, in SAD Section 3.7.2, Biological Safety now has an allowance for a case by case extension with the approval of the BLAF Manager. A copy of the BNL IACUC meeting minutes from 12/9/2003 that approved this change is attached.

Title and Date of Relevant SAD: NASA Space Radiation Laboratory (Booster Applications Facility) Safety Assessment Document, Revision 1, June 15, 2001.

Committee Chair or ESHQ Division Head must initial all items. Leave no blanks:

ITEM	APPLIES	DOES NOT APPLY
Decision to not revise the current SAD and/or ASE at this time:	sell	
The hazard associated with the proposed work or event is covered within an existing SAD and/or ASE.	RUL	
SAD Title and Date: NSPL SAD, Rev-1, 6/15/01.		
This Form and attachments, if necessary, shall be used to document the USI until the next revision of the appropriate SAD.	Oll	
Decision to submit a revised SAD and/or ASE to the BNL ESH Committee:		Sell
The hazard associated with the proposed work is not appropriately included in an SAD.		OUL

Pacy Vacol	1/30/04
Signature of C-A Committee Chair or C-A ESHQ Division Head	Date
Signature of C-A Associate Chair for ESHQ	2-2-04 Date

W. Gunther and M. Vazquez joined the meeting at 1:55 to discuss the first NASA run at the new NSRL facility. NSRL contains dedicated spaces to hold animals for irradiation experiments but it is not an accredited, satellite facility of the BLAF. In the last run, there was a problem with the beam, delaying one of the animal experiments, and a decision was made by the BLAF Manager and the affected investigator to keep the animals at the NSRL overnight hoping the beam would become operational in the morning. There was another delay the next day, and the animals were kept another night-so the animals were out of the BLAF for more than 24 hours. It was felt by the BLAF Manager that there would be less stress to the animals to keep them there rather than moving them several times. CAD management is very concerned about this and wants the IACUC to establish a policy regarding this issue should it recur in the future. M. Vazquez stated an experiment is planned that could keep the animals there for 5 days for daily irradiation. A member asked why not make it satellite facility? Aside from a few things that would need to be changed (such as inclusion in the Program, documented vermin control and air flow control programs, a humidification system, and daily animal log rooms), CAD management is opposed to making it a satellite. As this facility belongs to CAD, IACUC should not override this.. The next NASA run is planned for March, so a policy is needed soon. B. Scharf said IACUC can change the policy mandating the 24 hour rule to allow the animals out of BLAF for up to a week as long as it was scientifically justified and as long as all animal husbandry activities are properly attended to. As CAD management is uncomfortable with making the NSRL a satellite facility, the IACUC will allow this waiver only on a case by case basis. It was decided that the BLAF manager will make this determination in consultation with M. Vazquez and A. Rusik. If there is a conflict, W. Gunther will make the determination. CAD staff will be involved in the discussions. It must be made clear to investigators that the animals will be kept outside the BLAF in excess of 24 hours only for special circumstances and only on a case by case basis. W. Gunther and M. Vazquez left the meeting.

The committee voted to insert the following italicized wording in the Policies and Procedures: Section 19.1: With the exception of the fish housed in the Fish Facility in the Biology Department, no animals can be removed from the BLAF and maintained outside of the BLAF for more than 24 hours (12 hours for USDA regulated species). Requests for exceptions to this rule due to extenuating circumstances may be reviewed and approved by the BLAF Manager. A member asked if this would affect accreditation. It will not since NSRL is an inspected facility. The motion carried, 8 yes, 0 no.